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Via ECF and Facsimile to 631-712-5606

August 20, 2020

Hon. Joan M. Azrack, U.S.D.J.
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza, Courtroom 920
Central Islip, New York 11722

Re: *Jacob Adoni, et al. v. World Business Lenders, LLC, et al.*
Civ. Act. No.: 2:19-cv-06971(JMA)

Dear Honorable Judge Azrack:

As the Court is aware, I represent plaintiffs Jacob Adoni and Harbor Park Realty, LLC in the above referenced matter and I write in response to the defendants' Letter Request of June 17, 2020 for a Pre-Motion Conference (ECF 21) wherein defendants seek leave to file a motion to dismiss the instant action pursuant to Fed. R. Civ. P. 12(b)(6). For the reasons set forth below, plaintiffs respectfully request a final extension of time, up to and including August 28, 2020 to file an Amended Complaint and that defendants' instant application be denied without prejudice until after said Amended Complaint has been filed. A redacted version of this letter will be filed on the Court's docket via ECF and an unredacted version will be provided to Chambers via facsimile. Should the Court require, an unredacted version will also be provided to counsel for defendants.

The Court may recall that previous extensions of time to file the Amended Complaint were granted on April 27, 2020 and June 15, 2020, for which the undersigned counsel is deeply appreciative. The Court and counsel for defendants are not aware, however, that [REDACTED]

[REDACTED] Regrettably, this required the undersigned's immediate attention [REDACTED]

[REDACTED] I had truly hoped to file the Amended Complaint within the timeframe set forth in Court's Order of June 15, 2020, however, [REDACTED] severely impacted the undersigned's ability to complete the draft. [REDACTED]

Additionally, [REDACTED] and for the good cause shown as set forth above, the undersigned respectfully requests an additional eight (8) days to complete the draft of the Amended Complaint, up to and including August 28, 2020. The undersigned does not intend to seek any further extensions of time and prays that the Court grant the instant application.

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Again, I thank the Court profusely for its anticipated empathy for [REDACTED]
[REDACTED] and I request the extra time so that the Court can fully resolve this matter on the merits.

I thank the Court for its courtesy and consideration in this matter.

Respectfully submitted,

/s Marcus Aurelius Nussbaum
Marcus A. Nussbaum (MN 9581)

cc: **Via ECF**
All Counsel of Record